

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
SAFECO INSURANCE COMPANIES,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION NO. 1:04-CV-10989-NMG
v.	)	
	)	
NEW ENGLAND FOUNDATION	)	
COMPANY, INC., PATRICK A. O'NEILL	)	
and PATRICIA E. O'NEILL,	)	
Defendants.	)	
_____	)	

**DEFENDANTS' LOCAL RULE 16.1 CERTIFICATION**

Defendants, New England Foundation Company, Inc., Patrick A. O'Neill and Patricia E. O'Neill, and their counsel certify that they have conferred with plaintiff and its counsel: (a) with a view to establishing a budget for the costs of conducting the full course--and various alternatives courses--of the litigation; and (b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Respectfully submitted,

NEW ENGLAND FOUNDATION COMPANY, INC., PATRICK A. O'NEILL AND  
PATRICIA E. O'NEILL

By their attorneys,

PATRICIA E. O'NEILL

/s/ Francis C. Morrissey

/s/ Gregg A. Rubenstein

John V. Snellings (BBO #548791)

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/s/ Patricia O'Neill

Patricia O'Neill

Dated: August 12, 2005